

2024 MAY 14 P 12:31

COMPLAINT
(for non-prisoner filers without lawyers)

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

(Full name of plaintiff(s))

Coey A. Brown
3441 N. 24th Place
Milwaukee, WI 53206

v.

Case Number:

24-8-0594

(Full name of defendant(s))

Fred Meijer Corporate office (to be supplied by Clerk of Court)
2929 Walker Ave NW
Walker, MI 49544

A. PARTIES

1. Plaintiff is a citizen of Wisconsin and resides at
(State)

3441 N. 24th Place, Milwaukee WI 53206
(Address)

(If more than one plaintiff is filing, use another piece of paper.)

2. Defendant Fred Meijer
(Name)

is (if a person or private corporation) a citizen of Michigan
(State, if known)

and (if a person) resides at _____
(Address, if known)

and (if the defendant harmed you while doing the defendant's job)

worked for Meijers 11111 W. Burleigh St, Wauwatosa, WI 53222
(Employer's name and address, if known)

(If you need to list more defendants, use another piece of paper.)

B. STATEMENT OF CLAIM

On the space provided on the following pages, tell:

1. Who violated your rights;
2. What each defendant did;
3. When they did it;
4. Where it happened; and
5. Why they did it, if you know.

On Friday November 4, 2022 Coey Brown
the plaintiff sent Melanie Mahan a email
stating and Melanie is the regional human
resource for the western district, Coey Brown
the plaintiff sent Melanie an email
explaining how she was sexually
harassed by Devontray Green the human
resources director of the meijers store
located in wauwatosa Wisconsin giving
dates and details. In addition,

Coey Brown the plaintiff sent by email an 2 page attachment with over 15 isolated incidents with dates of things, or situations I was discriminated against by Jodi Caudill my direct supervisor at Meijers in the fashions department. On November 8, 2022

Coey Brown the plaintiff sent an email to Melanie Mahan the human resources regional director stating per our conversation over the phone that she didn't appreciate her saying that what Jodi did as far as racial discrimination and religious discrimination is old news. In addition Coey Brown the plaintiff sent Melanie Mahan On November 10, 2022 an email stating I have proof Tray Green the human resources store director sent an text message to Noah Jones (coworker of plaintiff) and called Noah Jones (sales associate) to tell her they will be investigating her because of her relationship with Devonay Green also called Tray. After this Noah was too afraid to testify against Tray Green. Coey Brown the plaintiff sent Melanie Mahan a screenshot of the text messages.

page 1A

A lot of black employees were quitting because of Jodi Caudill ~~she~~ sent Garrett Boyer an email stating look at management. Jodi has worked in many different departments at meijers because of this issue she was even the manager at the starbucks inside of meijers that was eventually closed due to theft and other issues but I'm not surprised.

The human resources personnel who hired me was no longer there. Finally, they hired ^{Coey Brown the plaintiff} ~~she~~ was on a leave of absence at the time due to the mistreatment of Jodi.

The last straw with Jodi was on ~~MAY~~ 28, 2022 when ^{Coey Brown the plaintiff} ~~she~~ had to call the police on Jodi Caudill for following me around the store, calling my name over the loud speaker and on the store phone repeatedly then she wanted to take a picture of my dogs which was not against store policy. The police came (wauwatosa police dept) The officer told Jodi to stay away from me the rest of the day because when he asked Jodi did ^{Coey Brown} break a policy Jodi stated she wasn't sure. The officer then stated it is indeed harassment if she is following me around and calling me for hours for no reason. However, Jodi still harassed me after the officer left but not as much as she was before the officer came. She told the officer that ~~she~~ was her subordinate.

Meijers has a high turnover rate so by this time there was a new store director named Stacey who did not stay long at this location either he eventually transferred to a different store but I talked to him the next day. I →

page 2A

explained to Stacey what happened and he said I did nothing wrong that the policy states you can't wear open-toe, sandals or crocs due to safety concerns. Open toes, sandals something could fall on your foot and crocs don't have good grip and you could slide, trip or fall easily but uggs are ok to wear. He said he talked to Jodi and she didn't know exactly what the policy was. He said he couldn't move me to a different department because they are short staffed in most or every department. I told him I didn't feel safe working with Jodi because she has told me on several occasions she will get me fired.

Stacey told me he would put me on a leave of absence and for me to take all the time off needed because I was truly traumatized and feared for my life. Jodi had been yelling at me then she would take cigarette breaks non stop and drink monster energy drinks non-stop. I have witnesses. A New Human Resources personnel was hired named Tray Green I had a couple of conversations over the phone he was asking people about me because they were coming back telling me so that's why I called him and met with him in person in his office in meijers at the waunakee Wisconsin location. He was very unprofessional he said he knew Jodi was racist and he would like for me to possibly switch to a different department which would be third shift stocker physically he knew I couldn't do that nor could I work the 3rd shift hours.

page 3A

so we wouldn't have a paper trail but I made sure to always add in over in the emails what we discussed paraphrased per our conversation over the phone. Melanie Mohan and Stacey both knew Tray Green made several advances towards me and I also made Melanie aware of Jodi's racism, her discriminating on my culture and jamaican heritage, Jodi spreading rumors about me, Tray's lies. He would tell me to come to work but I could never clock in. Melanie told me well what happened with you and Jodi is in the past now let's move forward which I felt she was dismissing everything I told her. When I told her the rumors she said it happens at every job. On November 10, 2022 I emailed Melanie Mohan that meijers was unprofessional. Stacey and Dianne were both informing Tray Green about the investigation on the sexual harassment because Noah Jones sent me texts stating Tray Green (Devontray Green) asking her to not say anything and I emailed Melanie Mohan the screenshots of the text messages. Melanie Mohan was trying to tell me over the phone I quit on 11/9/2022 ~~soon~~ so on 11/11/2022 I emailed her screen shots of the computer showing I was terminated because for days I was trying to clock in and I could not. I still did my training classes but someone would have to eventually clock me in which never happened. Also on 11/11/2022 I sent Melanie an

(Coby Brown plaintiff)

On January 26, 2022, I had a meeting with Jarrett Boyer who is the store director at the time. Our meeting was about Jodi saying racial slurs like coon but would pretend that she is talking about a racoon. When there is clearly no racoon in the store. Jodi would also take monster drinks off the shelf, drink them without paying for them in addition she would hide clothes in the fitting rooms. Well she hid some products but customers took them and bought them. So she confronted me stating I know your black ass probably took it and bought it yourself because it was marked down merchandise. Jarrett agreed with me this was bad behavior. He stated I will talk to Jodi then all 3 of us will have a meeting together. Well he definitely told Jodi because the next day 1/27/2022 she retaliated by putting a sign up "stating we could no longer put our things in the fitting room like our personal items. She also wrote in the communication binder the only people stealing around here are you people and that she was going to get me fired. Then he ripped out the paper and threw it out. I asked Jarrett when are we going to have a meeting, it NEVER happened. Lori took the sign down after I explained to her what happened. Jodi put the sign back up on 1/31/2022.

(Coey Brown plaintiff)

On 1/27/2022 I sent Jarett an email pertaining to our meeting the night before because I went to the doctor and they gave me 2 days off and said I needed to be on light duty due to me being in pain. Also, I stated I felt Jodi should be terminated based on her conduct.

(Coey Brown plaintiff)

On 1/24/2022 I sent an email to Jarrett Boyer (store director) Jodi Caudill (my direct team lead) and Thomas Dant (higher up) Explaining a bad run in I had with Jodi over the phone. I forgot to clock in from a 15 min break. Jodi did not want to fix my timecard. She grabbed my phone out my hand once and she grabbed my phone from out of a cart I was doing shopback in. However, Helen a (white employee) is always on video call with her boyfriend Jose is a team lead and they shouldn't even be working together. She catches Helen on the phone all the time and laughs about it. Jodi harasses myself and other black employees when they want to use the bathroom, calling me repeatedly over the loud speaker. Jodi had a mandatory meeting with only the black employees telling us follow guidelines like we can't go to lunch together although Helen and D'Angela go to lunch together all the time leaving no one on the sales floor to assist customers. I showed examples how Jodi treats the white and

spanish employees better than black employees. No one ever responded to any of my emails.

(Coey Brown plaintiff)

On January 29, 2022 I sent Jodi an email stating I handed her my doctor's excuse but she refused to take it. I put it in the communication binder that I needed off January 28-30 due to being in pain and having to be on light. However, Jodi still requested for me to lift mannequins up ladders and lift tables which Helen was supposed to do but never did.

On 1/24/2022 I sent:

4) Do you own any other property of value, such as real estate, stocks, bonds, trusts, or individual retirement accounts (e.g., IRA, 401 k), artwork, or jewelry?

Yes No

If "Yes," describe the property and the approximate value(s).

V. **Other Circumstances** – Describe any other financial circumstance(s) that you would like the Court to consider when reviewing this petition.

Losing a job is devastating. I had to find another job quickly but I did. No human deserves to be treated like this. This was mentally, physically, emotionally, financially exhausting.

I, Coey A. Brown, declare that I am the plaintiff bringing this complaint. I declare that I am unable to prepay the fee and that I am entitled to the relief sought in the complaint. I declare under penalty of perjury that the foregoing is true and correct.

May 14, 2024
Date

Coey A. Brown
Signature

working 2 jobs taking care of my Grandma. I would like to be award compensatory damages for 1 year of what all would of made at meijers per week for a year and 6 months to find an actual job with normal timing, back pay and forward pay. The pay for meijers is now \$15/hr.

I wasn't even making \$13/hr, $\$15 \times 20\text{hrs.} = \300
 $\$300 \text{ week} \times 78 \text{ months} = \$23,400.00$ I week

I also suffered from mental anguish and depression, hair loss, weight gain, sleepless nights. Legal and court cost of \$405 for filing complaint. Loss of enjoyment of life. I had to cancel trips for my birthday and my parents anniversary. I would like to be awarded 2.2 million dollars for my discrimination and retaliation as well as being harassed.

Being harassed for being a black human being, with verbal abuse and physical assault from my manager. Being threatened constantly to get written up. Also, I was discriminated against due to my religion I missed lots of religious meetings. I told Jodi I had to be light duty and she still told me to skip things including tables →

mannequins even after showing her my doctor's excuse and emailing her my doctor's excuse. 01/29/22 Jodi received an email from me stating I called her, showed her the doctor's excuse, put it in our communication binder on the board we check daily and she refused to take the doctor's excuse stating its insubordination. Also Jodi said it would be a no call no show when I requested off. I was discriminated against in every way, based on race, religion, sexually harassment, disability discrimination. I gave over 25 instances, numerous instances were not documented.

On 11/09/2022 Meijers, didn't show up to the appeal ^(representatives) for unemployment after denying me unemployment because I was out of work and unemployment held pay for a couple months due to meijers objecting and appealing my unemployment. I have unemployment documents that state Coey Brown the plaintiff was not at fault her employer asked a unreasonable request but she worked to the best of her abilities so in the end I was granted unemployment.

E. JURY DEMAND

I want a jury to hear my case.

- YES

- NO

I declare under penalty of perjury that the foregoing is true and correct.

Complaint signed this 14th day of May 2024.

Respectfully Submitted,

Coey A. Brown

Signature of Plaintiff

608-468-8645

Plaintiff's Telephone Number

brown-24@hotmail.com

Plaintiff's Email Address

3441 N. 24th Place

Milwaukee, WI 53206

(Mailing Address of Plaintiff)

(If more than one plaintiff, use another piece of paper.)

**REQUEST TO PROCEED IN DISTRICT COURT WITHOUT PREPAYING THE
FILING FEE**

I DO request that I be allowed to file this complaint without paying the filing fee. I have completed a Request to Proceed in District Court without Prepaying the Filing Fee form and have attached it to the complaint.

I DO NOT request that I be allowed to file this complaint without prepaying the filing fee under 28 U.S.C. § 1915, and I have included the full filing fee with this complaint.